

Baker & Hostetler LLP

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Presentment Date: December 29, 2015
Time: 12:00 p.m.

Objections Due: December 29, 2015
Time: 11:30 a.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF PRESENTMENT OF ORDER
CONCERNING DOCUMENTS PRODUCED PURSUANT
TO THE DECEMBER 11, 2013 LETTER OF REQUEST
UNDER THE HAGUE EVIDENCE CONVENTION**

PLEASE TAKE NOTICE that Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff, by the Trustee’s undersigned counsel, will present a proposed Order Concerning Documents Produced Pursuant to the December 11, 2013 Letter of

Request Under the Hague Evidence Convention, annexed hereto as Exhibit A (the “Order”), to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature on **December 29, 2015 at 12:00 p.m.** The Order authorizes the release to the Trustee of the documents produced by the Fondation Bettencourt Scheuller to the French Ministry of Justice (the “Documents”), and subsequently transmitted to this Court pursuant to the Honorable Burton R. Lifland’s December 11, 2013 letter of request issued upon the Court’s order of the same date [ECF No. 5601], granting the Trustee’s Motion for Issuance of Letters of Request Under the Hague Evidence Convention, dated November 4, 2013 [ECF No. 5556].

PLEASE TAKE FURTHER NOTICE that any objections to the Order (“Objections”), must (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefore; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein, One Bowling Green, New York, New York 10004; and (v) be served upon (a) Baker & Hostetler LLP, Counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Benjamin D. Pergament, Esq., and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than **December 29, 2015 at 11:30 a.m.**

PLEASE TAKE FURTHER NOTICE that in the event any Objections are timely served and filed, a hearing may be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the

Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the ECF docket number to which the filing relates shall be included in the upper right hand corner of the caption of all Objections.

PLEASE TAKE FURTHER NOTICE that unless an Objection to the Order, with proof of service, is timely filed with the Clerk of Court, served, and a courtesy copy delivered to Judge Bernstein's chambers, there will not be a hearing and the order may be signed.

Dated: New York, New York
December 18, 2015

By: /s/ Benjamin D. Pergament
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